



The Royal College of Speech and Language Therapists Wales (RCSLT) response to the request made by HEIW to provide written feedback on the draft HEIW Education and Training Plan (ETP) 2025/26 prior to its submission to the HEIW Board for approval in July

We are pleased to provide written feedback to this important consultation. We provide general comments below and information on future policy drivers for the profession.

Number of training places

We cautiously welcome the proposal of 58 speech and language therapy training places for 2025/26 (+3) which follows on from the increase of six training places in 2024/25. Whilst our preferred figure would be 5 additional training places for 2025/26 (please see our rationale set out in the policy lever section below), we recognise the financial pressures facing Welsh Government and that this small increase reflects, to a degree, the growing demand for speech and language therapy provision across a range of clinical areas.

We also have broader questions about the recommendations, given Welsh Government meetings suggesting that there will be a flat cash budget. We understand that two other financial options have been presented by HEIW but are keen to have clarity on what these alternative options would mean for each profession.

We would also welcome clarification on the comment accompanying the increase – ‘an increase in the recommendations has been made for this profession to take into account the requirement for the Welsh language route.’

We are strongly in favour of extra places at Wrexham University for 2025/26 given the small size of the course (the smallest in the UK) and local demand. We understand that there were 81 applications for 11 commissioned places in Wrexham (2023-2024) and the University had to close applications early due to the volume received. However, we are keen to clarify that these places are for the bilingual programme.

We have long raised concerns about the decision taken for Wrexham to deliver two undergraduate course streams from 2025/26 onwards – Welsh-medium and English medium. As a college, we are

hugely supportive of HEIW's ambition to create a sustainable, bilingual workforce. Cardiff Metropolitan currently offers 40% of the course through the medium of Welsh and Wrexham is also aiming to offer 40 credits through the medium of Welsh in the near future. We have welcomed the investment from the Coleg Cymraeg Cenedlaethol in Welsh-medium lecturers. We understand this model is very similar to that followed by other professions such as medicine, nursing and other allied health professions. We can find no evidence that any other healthcare course in Wales has been asked to deliver 100% of the course through the medium of Welsh. Given the small size of the course and the profession in Wales, we are concerned about the practicality of delivering a course fully through the medium of Welsh and, in particular, how the university would be able to cover the range of specialisms necessary to create an equitable experience for Welsh-speaking students. For example, phonetics, dysphagia. We firmly believe this decision needs to be reviewed and are pleased that constructive conversations have recently taken place between HEIW and Wrexham University. We would be happy to be involved in further conversations if helpful.

Future policy drivers for the profession

We believe the following policy developments should influence the number of training places commissioned.

Justice

The April 2023 Senedd Equality and Social Justice report, [60% Giving Them a Voice](#) made three key recommendations with relation to the speech and language therapy workforce

- The Welsh Government should work with Police and Crime Commissioners through the Youth Justice Blueprint Programme Board to assess the feasibility of having dedicated NHS speech and language therapists working in custody suites at police stations with a view to embedding them across Wales in the medium term.
- The Welsh Government should work with local authorities to develop plans for embedding speech and language therapists within every Youth Offending Team in Wales
- The Welsh Government should work with Health Education Improvement Wales (HEIW) to address any shortages being faced in the speech and language therapy profession, mapping the current roles and competencies of the SLCN workforce and ensuring adequate future workforce planning.

We were disappointed that these recommendations were rejected by Welsh Government but are aware that since the inquiry, a number of new youth justice roles have been created including in Cardiff and Carmarthenshire. Recent youth justice inspection reports from HMIP in Conwy and Denbighshire and Gwynedd and Môn flag speech and language therapy as a gap. We continue to work with youth justice service managers to push for more speech and language therapy posts within youth justice and anticipate that this will continue to be a growth area for the profession.

Growing demand and complexity in paediatric services

Members continue to report increasing demand for speech and language therapy services and complexity of service users post-COVID. A number of reports highlight the impact of COVID on speech, language and communication skills (ICAN, 2021, Hendry et al, 2022). This has been recognised by Welsh Government with the allocation of additional funding for children's speech and language therapy services from 2020-24. Welsh Government have also commissioned specific research by Bangor University on the impact of the pandemic on speech, language and communication skills and wellbeing for children aged 5-8 which may have implications for speech and language therapy. This research will be published in the Autumn. It is also of note that there has been an increase in the number of children in Wales with additional learning needs who have speech, language and communication needs - up to 33% (Welsh Government, 2023).

Mental health

The HEIW Strategic Mental Health Workforce plan makes a number of recommendations on new AHP roles and pathfinders. A number of speech and language therapy roles have been funded under the AHP pathfinders strand within the report and we anticipate growth in this area. Prior to the general election, we have also been involved in influencing the draft Mental Health bill at a UK level and have been calling for the responsible/approved clinician role to be extended to speech and language therapists (SLTs). Both developments have potential workforce implications if included within the King's Speech.

Dementia

Following the Welsh Government Dementia Action Plan reference to the importance of 'ensuring communication support including speech and language therapy' as part of multi-disciplinary teams supporting people with dementia, we have seen a significant increase in the numbers of SLTs working within dementia services. A 2022 survey of SLTs working in Dementia stated an ongoing inequality of services to people living with dementia across Wales. We are of the view that this will remain a growth area for the profession and we will be seeking to influence the upcoming new Welsh Government dementia plan.

Cancer

The 2023 Royal College of Physicians report, 'Cancer on the Front Line – the future of Acute Oncology services' highlights a number of good practice examples where SLTs have played key roles in multi-disciplinary teams and makes clear recommendations to 'invest in and expand the numbers of specialist allied health professionals (AHPs) working in Acute Oncology Services. This is echoed in

the recent Welsh Government Cancer Improvement Plan for NHS Wales which has an action to 'provide equal access to Acute Oncology Services teams'. We believe cancer will be a growth area for the profession.

Increased funding for AHPs in the community

In January 2023, the Minister announced £5 million recurrent investment in AHPs in the community. The population of over 75s is projected to increase from 9.3% in 2018 to 13.7% in 2028 (Office for National Statistics, 2019). This will lead to more people with swallowing and communication difficulties from stroke, dementia and other conditions. SLTs are key in enabling people to live well at home by reducing risks when eating and drinking and aiding communication such as with family and health and care professionals. We welcome recent, recurrent investment in Allied Health Professional roles in the community and piloting of initiatives such as speech and language therapy hot clinics. Demand for speech and language therapy in this area will grow

More than Just Words:

The Welsh Government plan for providing health and care services through the medium of Welsh includes a key action under the section Welsh language planning and policies that states that 'establishing Welsh language care pathways for vulnerable individuals in identified priority groups such as older people, children, mental health, speech therapy, learning difficulties, and stroke services'. RCSLT guidelines clearly state that speech and language therapy intervention should be provided in the individual's mother tongue and support the family in their use of mother tongue when necessary/appropriate. There is a clear clinical rationale for the availability of Welsh language speech and language therapy and as a college, we are committed to supporting improvements in this area. Ensuring an adequate supply of Welsh speaking newly qualified practitioners is clearly a key priority in ensuring the availability of Welsh language services.

In addition, recent research commissioned by the Stroke Association highlights concerns about availability of Welsh language speech and language therapy provision for people with aphasia. This will be launched at the National Eisteddfod at a panel attended by the Welsh Language Commissioner. We are pleased that the proposed ETP recognises the need to grow the number of Welsh speaking SLTs.

Neonatal

The recent draft maternity and neonatal quality framework commits to

- Systematic monitoring of demand and capacity information to inform service design and configuration, with consideration of acuity, complexity and specialist requirements to enable delivery in line with national standards.

- Systems are in place to maintain recommended staffing ratios in line with acuity; for example, women in established labour must receive one-to-one care and support from a midwife, whilst babies should be cared for in line with British Association of Perinatal Medicine standards.

We have raised concerns that consistent audits show that no neonatal SLT services in Wales currently meet the British Association of Perinatal Medicine standards. We have submitted evidence to both the 2023 WHSSC Specialised Services consultation on Neonatal Services (Intensive Care, High Dependency and Special Care) Commissioning Policy and the recent draft maternity and neonatal quality statement. We understand that Health and Care Research Wales will shortly be publishing its rapid review on AHP working in neonatal services. We anticipate demand in this area will grow.

Health inequalities

We were delighted by the recent announcement by Welsh Government to create a permanent National Speech, Language and Communication Co-ordinator post within Welsh Government. There is a clear aspiration from government to move towards a greater focus on prevention recognising the importance of universal and targeted provision. SLTs have a clear role to play in preventing longer term public health problems.

We hope these comments are helpful. Please do contact us if you require any further information.

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